

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)	4:17CR3038
	)	
	)	
	)	
Plaintiff,	)	MOTION TO ALLOW FOR
	)	THE TESTIMONY OF
vs.	)	STANLEY STUMP, SR.
	)	
MICHAEL WAYNE PARSONS,	)	
	)	
Defendant.	)	

COMES NOW Donald L. Schense, Attorney at Law, and as counsel for the Defendant moves this Court for an Order allowing for the taking of the testimony of Stanley Stump, Sr., who is the Hereditary Grand Chief, Chilcotin National Congress. Counsel would indicate that this witness would offer testimony to the Court regarding the Defendant's role, position and stature in the Tsilhqot'in Nation along with the titles the Defendant holds within the Nation. He could offer testimony of the history of the Nation itself. Counsel represents that this testimony would provide evidence to the Court to determine not only jurisdiction over this matter, but also other issues relative to this case that have been raised previously by the Defendant well before present counsel was appointed to represent him. Counsel would respectfully request that the parties only be required to brief this issue until after this proffered testimony is complete. Only at that point will counsel for both parties be adequately informed to address all issues, if any, presented by Grand Chief Stump.

Counsel has been in contact with members of the Nation and has arranged that this witness would be available to testify via Skype. The Court could have the witness administered the proper oath and both parties and the Court could examine the witness. This would ensure that a complete and proper record could be made in the event this novel and unique issue is ever raised on appeal.

MICHAEL WAYNE PARSONS, Defendant

BY:/S/ DONALD L. SCHENSE  
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CERTIFICATE OF SERVICE

This is to certify that I delivered a copy of the above Motion to the U.S. Attorneys Office and all other parties of record by electronically filing this document with the U. S. District Court in Omaha, NE on this 23rd day of May 2018.

/S/ DONALD L. SCHENSE